

COME RAIN, WE SHINE™

**STORMWATER**  
MANAGEMENT, INC.

January 16, 2003

Rebecca Kane  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Mail Code 2222A  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

RE: Comments on EPA ECHO Water Program Tool

Stormwater Management Inc. commends EPA for developing the Enforcement & Compliance History Online (ECHO) database and for making the data publicly available. The tool is a notable accomplishment for the EPA and will ensure a more informed citizenry on pressing environmental issues. We believe that having access to data by community stakeholders is a vital democratic principle. By virtue of having environmental and compliance data publicly available we believe industrial users of our natural resources will be more inclined to take all reasonable and effective steps to minimize pollution and degradation of those resources.

Stormwater Management Inc. as a business is dependent on compliance and enforcement of the Clean Water Act. We prefer that our customers seek our product solutions in order to be compliant with the law and to do what is right rather than to defend themselves against citizen law suits or other less productive motivators. We believe that having data publicly available in a national database format like ECHO will promote corporate responsibility by allowing facility owners equal access to their compliance history online. There are several specific areas we would like to comment on:

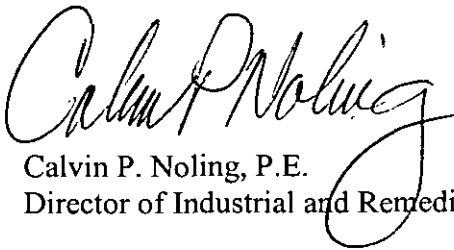
1. Compliance Status section. We value the amount of detail currently available in this section of ECHO but suggest the data be further categorized to allow more detailed queries. Specifically, the database only contains NPDES compliance history as a whole. Stormwater Management Inc. suggests there would be value to distinguish between NPDES wastewater and NPDES stormwater in ECHO.
2. The database should be able to be queried for specific pollutants. Having access to this information would, for example, allow database users to determine where and how sources of specific pollutants might influence water quality in a surface water body that is listed as water quality limited for a specific pollutant. For example, one might like to know which facilities are discharging copper to surface water at levels exceeding permit standards because the receiving water is listed as water quality impaired for that parameter.

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3. The ECHO database is a good tool for environmentally conscious organizations and citizens, but the strength of this database lies in the reliability and timeliness of the data. Accuracy of site names, compliance status and location should be emphasized. Also clearly stating the type of reporting actually covered is necessary. Omitted data points can be as misleading as incorrect ones. If ECHO is not an inclusive database of CWA violations, we suggest the data base include a statement of any known limitations.

The ECHO database is an important step toward improving compliance and accountability of facilities using our natural resources. We support ECHO and recommend it be advanced from a pilot project to full and permanent implementation.

Sincerely,

A handwritten signature in black ink, reading "Calvin P. Noling". The signature is fluid and cursive, with the first name "Calvin" and last name "Noling" clearly distinguishable. The signature is positioned above the printed name and title.

Calvin P. Noling, P.E.  
Director of Industrial and Remediation Business